



*United States Attorney
Eastern District of New York*

SA:MW/MJJ
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By Email and ECF

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Re: United States v. Ibrahim Suleiman Adnan Adam Harun
Criminal Docket No. 12-134 (BMC)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G), the government writes to advise that it anticipates calling the following experts to testify at trial.

Evan F. Kohlmann

The government anticipates calling Evan F. Kohlmann to testify at trial as an expert witness regarding al-Qaeda. Mr. Kohlmann is a private International Terrorism Consultant who specializes in tracking al-Qaeda. He holds a degree in International Politics from the Edmund A. Walsh School of Foreign Service at Georgetown University, and a Juris Doctor from the University of Pennsylvania Law School. Mr. Kohlmann is also the recipient of a certificate in Islamic studies from the Prince Alwaleed bin Talal Center for Muslim-Christian Understanding (CMCU) at Georgetown University. Currently, Mr. Kohlmann works as a senior partner at Flashpoint Global Partners, a New York-based security consulting firm, and he serves as an on-air analyst for NBC News in the United States and as an investigator with the NEFA Foundation. Mr. Kohlmann authored the book al-Qaida's Jihad in Europe: the Afghan-Bosnian Network (Berg/Oxford International Press, London, 2004), which has been used as a teaching text in graduate-level terrorism courses offered at

such educational institutions as Harvard University's Kennedy School of Government, Princeton University, and the Johns Hopkins School of Advanced International Studies (SAIS). Mr. Kohlmann's *curriculum vitae* is enclosed.

At trial, the government anticipates that Mr. Kohlmann will testify regarding the history of al-Qaeda, as well as its infrastructure, leadership and geographic locations during the relevant time period outlined in the indictment. In addition, Mr. Kohlmann will testify about the location and operation of certain al-Qaeda training camps. We also anticipate that Mr. Kohlmann will testify about terrorist attacks carried out by al-Qaeda and about the background and the significance of certain individual terrorists and regional al-Qaeda affiliates, including al-Qaeda in the Land of the Islamic Maghreb ("AQIM", formerly known as the Salafist Group for Prayer and Combat or "GSPC") and jihadist groups operating in Nigeria, Niger, Libya and the Sahel desert region of Africa, including Boko Haram. Finally, we anticipate that Mr. Kohlmann will testify about the common meaning and usage of words and concepts used by members of the global jihadist movement.

Mr. Kohlmann has prepared a draft report addressing these topics. This draft report, along with relevant supporting materials, is enclosed.

The sources and bases for Mr. Kohlmann's expert testimony include his experience as a testifying and consulting expert witness in numerous federal trials, his experience in interviewing terrorists and his review of open source materials pertaining to terrorism and terrorist organizations, including but not limited to al-Qaeda and AQIM/GSPC. Further information about Mr. Kohlmann's qualifications and testimony is contained in his 3500 material, which will be provided in advance of trial.

Fingerprint Experts

The government anticipates calling Nicole Bagley, a forensic examiner at the FBI's Latent Print Operations Unit. Ms. Bagley is expected to testify regarding the examination and identification of latent prints on the Quran recovered near the location of the April 25, 2003 attack in the vicinity of FOB Shkin in Afghanistan. Materials related to Ms. Bagley's anticipated testimony were produced on June 27, 2013 (bearing Bates numbers 42-51) and October 31, 2016 (bearing Bates numbers 194-200).

In addition, the government anticipates calling one or more additional fingerprint experts to testify regarding the examination and identification of latent prints on various documents recovered in Afghanistan bearing the fingerprints of senior al-Qaeda officials Nashwan Abdulrazaq Abdulbaqi (also known as "Abd al Hadi al-Iraqi" and "Abd al Hadi al-Ansari") and Abu Faraj al-Liby (also known as "Mustafa Faraj al-Uzaybi"). Materials related to this testimony were previously produced on November 19, 2015 (bearing Bates numbers 39-201).

Additional materials and expert disclosures related to these fingerprint experts will be produced in advance of trial.

Translators

Finally, in the absence of stipulations, the government may call witnesses to testify regarding their translations of various documents and audio and video files from foreign languages into English that have previously been produced in discovery. Additional materials and expert disclosures related to any translators the government intends to call will be produced in advance of trial.

The government reserves the right to call substitute expert witnesses, as well as to call additional expert witnesses. The government will comply with Federal Rule of Criminal Procedure 16(a)(1)(G) and Federal Rule of Evidence 702, 703 and 705 and notify you in a timely fashion of any additional or substitute experts that the government intends to call at trial and provide you with a summary of the expert's opinion.

Very truly yours,

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Enclosures

Cc: Clerk of Court (BMC) by ECF without enclosures